

EXHIBIT A

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9 LUCASFILM LTD.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 IN RE: HIGH-TECH EMPLOYEE
14 ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Case No. 5:11-cv-2509-LHK

**DECLARATION OF JUSTINA K.
SESSIONS IN SUPPORT OF PIXAR AND
LUCASFILM'S JOINT RESPONSE TO
PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL**

1 I, JUSTINA K. SESSIONS, declare and say that:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 associate with the law firm of Keker & Van Nest LLP, located at 633 Battery Street, San
4 Francisco, California 94111, counsel for Defendant Lucasfilm Ltd. ("Lucasfilm") in the above-
5 captioned action. I am duly admitted to practice law before this Court. I have knowledge of the
6 facts set forth in this declaration, and if called to testify as a witness thereto could do so
7 competently under oath.

8 2. For the reasons outlined below, and the reasons provided in the Declaration of
9 David J. Anderman in Support of Defendants' Joint Response to Plaintiffs' Administrative
10 Motion to Seal [Dkt. No. 199], Lucasfilm seeks to maintain under seal the specific compensation
11 benchmark percentiles described on p. 10 of the Rebuttal Supplemental Expert Report of Edward
12 E. Leamer.

13 3. Lucasfilm strictly maintains the confidentiality of its compensation benchmarking
14 targets. Lucasfilm could be competitively harmed if other companies gained access to this
15 information because, among other things, it would enable competitors to determine Lucasfilm's
16 pay practices. Other companies could adjust their own compensation practices based on their
17 knowledge of Lucasfilm's compensation benchmarks.

18 4. Because Lucasfilm has sought to maintain the confidentiality of the materials
19 described above, and because public disclosure of these materials could cause Lucasfilm
20 significant harm or could result in the disclosure of private personal information, the portions of
21 the documents described above should be redacted and shielded from disclosure to Lucasfilm's
22 potential competitors and the public.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is
24 true and correct and that this declaration was executed in San Francisco, California, on July 19,
25 2013.

26
27 /s/ Justina K. Sessions
28 JUSTINA K. SESSIONS